

KLEINBERG, KAPLAN, WOLFF &  
COHEN, P.C.  
Matthew J. Gold  
Robert M. Tuchman  
500 Fifth Avenue  
New York, New York 10110  
Tel: (212) 986-6000

*Counsel to the State of Washington*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	x	
<b>In re:</b>	:	Chapter 11
	:	
<b>PURDUE PHARMA L.P., et al.,</b>	:	Case No. 19-23649 (SHL)
	:	(Jointly Administered)
<b>Debtors.</b>	:	
	:	
-----	x	

**TENTH MONTHLY FEE STATEMENT OF  
KLEINBERG, KAPLAN, WOLFF & COHEN, P.C. AS COUNSEL TO  
THE STATE OF WASHINGTON FOR COMPENSATION FOR  
SERVICES AND REIMBURSEMENT OF EXPENSES INCURRED  
FOR THE PERIOD OF NOVEMBER 1, 2022 THROUGH NOVEMBER 30, 2022**

<b>Name of Applicant:</b>	Kleinberg, Kaplan, Wolff & Cohen, P.C.
<b>Provided Professional Services to:</b>	The State of Washington
<b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>	March 10, 2022 [Docket No. 4503]
<b>Period for which compensation and reimbursement are sought:</b>	November 1, 2022 through November 30, 2022
<b>Amount of Compensation sought as actual, reasonable, and necessary:</b>	\$64,978.80
<b>Current Fee Request</b>	\$51,983.04 (80% of \$64,978.80)
<b>Amount of Expense Reimbursement sought as actual, reasonable, and necessary:</b>	\$0.00
<b>Amount of Compensation and Expenses sought as allowed under the Interim Compensation Order</b>	\$51,983.04
<b>Total Fees and Expenses Inclusive of Holdback</b>	\$64,978.80
<b>This is a(n):</b> <input checked="" type="checkbox"/> Monthly Application <input type="checkbox"/> Interim Application <input type="checkbox"/> Final Application	

Pursuant to the *Order Pursuant to 11 U.S.C. §§ 105 and 363(b) Authorizing and Approving Settlement Term Sheet* [Docket No. 4503] (the “Term Sheet Order”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Docket No. 529] (the “Interim Compensation Order”), Kleinberg, Kaplan, Wolff & Cohen, P.C. (“Kleinberg Kaplan”), counsel to the State of Washington in the above-captioned case, and in a related adversary proceeding and appeals, hereby submits this Tenth Monthly Fee Statement (the “Fee Statement”) for the period of November 1, 2022 through and including November 30, 2022 (the “Statement Period”).

**Itemization of Services Rendered and Disbursements Incurred**

Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period, with respect to each of the billing categories. As reflected in Exhibit A, Kleinberg Kaplan incurred \$64,978.80 in fees during the Statement Period. Pursuant to this Fee Statement, Kleinberg Kaplan seeks reimbursement for 80% of such fees, totaling \$51,983.04.

Annexed hereto as **Exhibit B** is a chart of Kleinberg Kaplan's professionals and paraprofessionals, including standard hourly rate for each attorney and paraprofessional who rendered services to the State of Washington and others listed above in connection with these Chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. A copy of the computer-generated time entries of Kleinberg Kaplan reflecting all time recorded, organized in the billing categories requested by the State of Washington is attached hereto as **Exhibit C**.

**Notice**

Kleinberg Kaplan will provide notice of the Fee Statement in accordance with the Interim Compensation Order.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Fee Statement, serve via email, to Kleinberg Kaplan and to the notice parties designated in the Interim Compensation Order, a written notice setting forth the precise nature of the objection and the amount at issue.

If an objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Kleinberg Kaplan an amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue; it shall not be sufficient to simply object to all fees and expenses.

Dated: January 4, 2023

Respectfully submitted,

KLEINBERG, KAPLAN, WOLFF & COHEN, P.C.

By: /s/ Matthew J. Gold  
Matthew J. Gold  
Robert M. Tuchman

500 Fifth Avenue  
New York, New York 10110  
Tel: (212) 986-6000  
Fax: (212) 986-8866  
E-mail: [mgold@kkwc.com](mailto:mgold@kkwc.com)  
[rtuchman@kkwc.com](mailto:rtuchman@kkwc.com)

*Attorneys for the State of Washington*

**EXHIBIT A**

**SERVICES RENDERED BY**

**KLEINBERG, KAPLAN, WOLFF & COHEN, P.C.**

**COMMENCING NOVEMBER 1, 2022 THROUGH NOVEMBER 30, 2022**

**Summary of Fees Task Code**

<b>Billing Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
001 Purdue Pharma	53.2	\$58,630.80
005 Fee Applications	8.3	\$6,348.00
<b>Total</b>	<b>61.5</b>	<b>\$64,978.80</b>
20% Fee Holdback		<b>\$12,995.76</b>
80% of Fees		<b>\$51,983.04</b>
Plus Expenses		<b>\$0.00</b>
Requested Amount		<b>\$51,983.04</b>

**EXHIBIT B**

**SERVICES RENDERED BY**

**KLEINBERG, KAPLAN, WOLFF & COHEN, P.C.**

**COMMENCING NOVEMBER 1, 2022 THROUGH NOVEMBER 30, 2022**

**Summary of Hours and Fees by Professional**

<b>Name of Professional</b>	<b>Position/Year Admitted to Practice/Department</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Matthew J. Gold	Partner 1983 Bankruptcy	\$1,060	39.4	\$41,764.00
Robert L. Berman	Partner 1978 Securities and Corporate Finance	\$1,176	19.3	\$22,696.80
Ellie Taylor	Paralegal Litigation & Risk Management	\$185	2.8	\$518.00
<b>Total Fees Requested</b>				<b>\$64,978.80</b>

**EXHIBIT C**

**Time Entries for Each Professional by Task Code (Invoices)**

Kleinberg Kaplan Wolff & Cohen P.C.  
500 Fifth Avenue  
New York, NY 10110

State of Washington  
SAAG Administrator  
Email: SAAG@atg.wa.gov  
cc: Washington State Attorney General's Office  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104

Invoice Date: December 23, 2022  
Invoice Number: 116360  
Matter Number: 7263-0001

Client: State of Washington  
Matter: Purdue Pharma

*For professional services rendered through November 30, 2022*

Currency: USD

Fees 58,630.80

---

<b>Total Amount Due</b>	<b>\$58,630.80</b>
-------------------------	--------------------

<b>Please Remit to:</b>	<b>Mail To:</b> Kleinberg, Kaplan, Wolff & Cohen, P.C. 500 Fifth Avenue New York, N.Y. 10110	<b>Wire Instructions:</b> Citibank N.A. ABA Number: 021000089 Swift Code: CITIUS33 (International) Account # 9987286692 (Please Reference Invoice Number)
-------------------------	--	--



Client: State of Washington  
Matter: Purdue Pharma

Invoice Date: December 23, 2022  
Invoice Number: 116360  
Matter Number: 7263-0001

**Time Detail**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/01/2022	Matthew J. Gold	Continuing review and revision of Intercreditor Agreement	2.40	1,060.00	2,544.00
11/01/2022	Robert Berman	Reviewing email and attachment	0.80	1,176.00	940.80
11/02/2022	Matthew J. Gold	Conferring regarding Intercreditor Agreement; revising outline regarding same	1.70	1,060.00	1,802.00
11/02/2022	Robert Berman	Conferring and begin reviewing revised draft of the Intercreditor Agreement	2.10	1,176.00	2,469.60
11/03/2022	Matthew J. Gold	Continuing review and revision of Intercreditor Agreement	4.80	1,060.00	5,088.00
11/03/2022	Robert Berman	Marking-up Intercreditor Agreement	2.60	1,176.00	3,057.60
11/04/2022	Matthew J. Gold	Continuing review and revision of Intercreditor Agreement; revising outline regarding same	3.40	1,060.00	3,604.00
11/04/2022	Robert Berman	Conferring regarding issues on Collateral and Intercreditor Agreement; reviewing	2.00	1,176.00	2,352.00
11/07/2022	Matthew J. Gold	Continuing review and revision of Intercreditor Agreement; conferring regarding same; circulating redlines and clean draft to working group	4.60	1,060.00	4,876.00
11/07/2022	Robert Berman	Providing revised provisions for the Intercreditor Agreement; responding to questions and conferring regarding open issues and next steps	2.70	1,176.00	3,175.20
11/08/2022	Matthew J. Gold	Continuing review and revision of Intercreditor Agreement; conferring regarding same	4.20	1,060.00	4,452.00
11/08/2022	Robert Berman	Conferring regarding next steps	0.80	1,176.00	940.80
11/09/2022	Matthew J. Gold	Continuing review and revision of Intercreditor Agreement; revising outline regarding same	0.60	1,060.00	636.00
11/09/2022	Robert Berman	Reviewing points raised in email for discussion with working group	0.40	1,176.00	470.40
11/10/2022	Matthew J. Gold	Conferring regarding Intercreditor Agreement; conferring regarding same	0.20	1,060.00	212.00
11/10/2022	Robert Berman	Conferring regarding call with working group and open issues	1.50	1,176.00	1,764.00

Client: State of Washington  
Matter: Purdue Pharma

Invoice Date: December 23, 2022  
Invoice Number: 116360  
Matter Number: 7263-0001

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/11/2022	Robert Berman	Conferring; reviewing prior court opinion regarding releases	1.50	1,176.00	1,764.00
11/16/2022	Robert Berman	Reviewing for upcoming call; conferring	1.30	1,176.00	1,528.80
11/17/2022	Matthew J. Gold	Conferring regarding Intercreditor Agreement	0.20	1,060.00	212.00
11/17/2022	Robert Berman	Preparing for conference call	0.40	1,176.00	470.40
11/18/2022	Matthew J. Gold	Preparing for conference call; conferring with I. Goldman, G. Fay and T. Lundgren regarding Intercreditor Agreement	2.20	1,060.00	2,332.00
11/18/2022	Robert Berman	Conferring; preparing for call; working group call regarding revised draft of Collateral Trust Agreement	2.00	1,176.00	2,352.00
11/21/2022	Matthew J. Gold	Reviewing prior drafts of Intercreditor Agreement of comments to same	2.40	1,060.00	2,544.00
11/23/2022	Matthew J. Gold	Exchanging emails with I. Goldman regarding comments to Intercreditor Agreement; conducting initial review of same	2.20	1,060.00	2,332.00
11/23/2022	Robert Berman	Reviewing emails regarding comments on collateral trust agreement and begin reviewing comments	1.20	1,176.00	1,411.20
11/28/2022	Matthew J. Gold	Reviewing comments to Intercreditor Agreement; revising outline regarding same	3.60	1,060.00	3,816.00
11/30/2022	Matthew J. Gold	Reviewing comments to Intercreditor Agreement; revising outline regarding same	1.40	1,060.00	1,484.00
<b>Total</b>			<b>53.20</b>		<b>\$58,630.80</b>

#### Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Matthew J. Gold	33.90	1,060.00	35,934.00
Robert Berman	19.30	1,176.00	22,696.80
<b>Total</b>	<b>53.20</b>		<b>\$58,630.80</b>

Kleinberg Kaplan Wolff & Cohen P.C.  
500 Fifth Avenue  
New York, NY 10110

State of Washington  
SAAG Administrator  
Email: SAAG@atg.wa.gov  
cc: Washington State Attorney General's Office  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104

Invoice Date: December 23, 2022  
Invoice Number: 116361  
Matter Number: 7263-0005

---

Client: State of Washington  
Matter: Fee applications

*For professional services rendered through November 30, 2022*

Currency: USD

Fees 6,348.00

---

<b>Total Amount Due</b>	<b>\$6,348.00</b>
-------------------------	-------------------

<b>Please Remit to:</b>	<b>Mail To:</b> Kleinberg, Kaplan, Wolff & Cohen, P.C. 500 Fifth Avenue New York, N.Y. 10110	<b>Wire Instructions:</b> Citibank N.A. ABA Number: 021000089 Swift Code: CITIUS33 (International) Account # 9987286692 (Please Reference Invoice Number)
-------------------------	--	--

Client: State of Washington  
Matter: Fee applications

Invoice Date: December 23, 2022  
Invoice Number: 116361  
Matter Number: 7263-0005

#### Time Detail

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/01/2022	Matthew J. Gold	Conferring regarding monthly statement	0.50	1,060.00	530.00
11/01/2022	Ellie Taylor	Filing Eighth Monthly Fee Statement; serving Eighth Monthly Fee Statement; conferring regarding certificate of service; preparing and filing certificate of service	2.10	185.00	388.50
11/08/2022	Matthew J. Gold	Reviewing D. Klauder letter; exchanging emails with D. Klauder regarding same and scheduling call	0.40	1,060.00	424.00
11/09/2022	Matthew J. Gold	Preparing outline for call with D. Klauder; conferring with D. Klauder regarding fees	1.70	1,060.00	1,802.00
11/14/2022	Matthew J. Gold	Reviewing agenda for omnibus hearing	0.20	1,060.00	212.00
11/15/2022	Matthew J. Gold	Reviewing time records for monthly statement; reviewing draft interim fee order; conferring regarding same; exchanging emails with K. Somers regarding same	0.90	1,060.00	954.00
11/15/2022	Ellie Taylor	Reviewing statement from Davis Polk; compiling internal fee statement tracking	0.50	185.00	92.50
11/16/2022	Matthew J. Gold	Appearing at hearing regarding interim fee applications	1.20	1,060.00	1,272.00
11/16/2022	Ellie Taylor	Preparing communication regarding passage of deadline for Eighth Monthly Fee Statement	0.20	185.00	37.00
11/28/2022	Matthew J. Gold	Exchanging emails regarding reimbursement amounts	0.30	1,060.00	318.00
11/30/2022	Matthew J. Gold	Exchanging emails with Washington regarding reimbursement amount; reviewing entries regarding same; exchanging emails regarding same	0.30	1,060.00	318.00
<b>Total</b>			<b>8.30</b>		<b>\$6,348.00</b>

#### Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Ellie Taylor	2.80	185.00	518.00

Client: State of Washington  
Matter: Fee applications

Invoice Date: December 23, 2022  
Invoice Number: 116361  
Matter Number: 7263-0005

---

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Matthew J. Gold	5.50	1,060.00	5,830.00
<b>Total</b>	<b>8.30</b>		<b>\$6,348.00</b>